From: "sharon.m.johnson@ncmail.net%inter2" <sharon.m.johnson@ncmail.net>
Subject: Farm Bill 2007 Official Comments - 12/30/2005 10:03 AM CST
Date Sent: 12/30/2005 10:03:18 CST
Date Received: 12/30/2005 10:04:17 CST

Email: sharon.m.johnson@ncmail.net
FirstName: Sharon
LastName: Johnson
Address1: 1639 Mail Service Center
Address2:
City: Raleigh
State: North Carolina
zipcode: 27699
Question1:
Question2:
Question3:
Question4: Agriculture plays a major role in natural resource stewardship and our nation?s farm policy should consider this in relation to its funding and program goals.

As one example of current farm policy to promote stewardship, the voluntary Conservation Security Program (CSP) provides stewardship payments to farmers for conservation practices. Receipt of payments such as this and others stipulate that funding recipients implement best management practices for the conservation of soil and water and other environmental benefits. Conservation plans may also be required but may focus only on the activity being enacted rather than a whole farm approach.

Environmental management systems (EMS) are a comprehensive approach for any organization to identify, plan, and mitigate actual and potential impacts on the environment. An EMS encompasses both regulated and non-regulated impacts to the environment. A formal voluntary international standard, ISO 14001, was adopted in 1996 and has since been adopted by a range of organizations. The North Carolina Department of Environment and Natural Resources (DENR) Division of Pollution Prevention and Environmental Assistance in partnership with the Division of Soil & Water Conservation and the N. C. State University Agriculture Extension Agency, has worked directly with farmers to adopt an EMS based on the ISO 14001 model. Based on this experience, EMS have been shown to have positive benefits to both farmers and to the environment.

NC staff have worked directly with livestock operations and have seen EMS implementation help farms improve their emergency preparedness, increase their knowledge of regulatory requirements, improve record keeping, increase worker training and communication, especially regarding work procedures, and a number of other improvements. Chuck Stokes is the owner of Little Creek Hog Farm Inc. in Pitt County, a contract finishing operation with 36,720 finishers and one of the farmers in NC?s EMS program. Chuck stated:
Today it is simply not adequate to identify a set of problems, goals or strengths. As farmers we must go after improvements, mark them off as completed, and move on to the next challenge. EMS is the vehicle to accomplish this. EMS allows us to incorporate a system of checks and balances that eventually will hold us accountable to ourselves and others that in the end will result in a more environmentally efficient farm.

The EMS takes an ?umbrella? approach and considers not only day-to-day activities, but also infrequent activities (such as sludge clean-out)

and potential accidents or emergencies that may impact the environment and may impact a farm?s efficiency. An EMS also allows for a farm to consider cumulative impacts from various activities that combined may have more of an impact than when considered singly. Some observations from implementation of an EMS on farms:

? Improved documentation, which leads to increased accountability and responsibility, as well as better communication between employees and neighbors. A producer commented that with the help of the communications requirement of the EMS, he has found several ways to help keep good relations with his neighbors, such as sending out a newsletter about the operation and encouraging them to let him know when they are planning outdoor activities.
? Improved emergency preparation. One producer stated that the effectiveness of his EMS was apparent during Hurricane Isabel in 2003. The farm?s hurricane preparation time was cut from four days to two days because each employee knew their individual duties and were able to quickly perform them, saving the farm both time and money. He also credits the EMS with preventing temporary ?patches? to problems on the farm, helping to provide a more permanent basis for repairs.
? Reduced neighbor complaints to the regulatory agency. Due to the community communication started under the EMS, the community is aware of what is going on, is more understanding of the process, and comes directly to the business owner.
? Inspection visits are faster with an EMS in place.
? Improved lagoon sludge management. The EMS led several producers to evaluate and act on sludge accumulation in their lagoons, ahead of regulatory requirements.
? Having written work instructions improves training and accountability.
? Training helped to connect the work practices employees were asked to do each day with regulatory requirements or other measures to protect the environment. Participants believed the employees appreciated the training they received. The training emphasized not only how to do their tasks, but also why the task was important and how it might prevent impacts to the environment. For instance, fan motors are dusted weekly. While this was a long-standing practice, the link was made that this helps prevent fires, thereby preventing harm to both the animals and the environment. In another example, a farm had set as an objective and target to install travel guide markers for its field spray operation. While employees assisted with this task, they did not know why this was important until it was explained in the training class that this helped ensure proper application of waste material in accordance with the farm?s land application program.
? Public opinion was of great importance to the farmers and they saw the EMS as a way to improve that area of management.
? Translation of farm policies, work instructions, etc. was valuable for farms with non-English speaking employees. Having the information in Spanish seemed helpful, as did having digital photos included in training sessions to show examples of working or broken equipment (such as a leaking nipple waterer).
? In working with the farm managers, talking to them about various potential emergency scenarios was a good process. For example, in thinking about a gas delivery truck and how the driver accessed the tank, it led one farmer to place a post in front of the tank painted bright orange to prevent the driver from backing up too close and possibly hitting or damaging the tank. This was a simple and relatively inexpensive thing to do and lowered the risk of an accident with potential environmental impacts.

Additional information on agriculture and EMS can be found in a NC DENR EMS Final Report at http://www.p2pays.org/porktool/procedures/finalrpt.pdf or at http://www.p2pays.org/iso/ag.asp.

Building on NC?s EMS farm project, NC DENR worked collaboratively with Murphy-Brown LLC, the livestock production subsidiary of Smithfield Foods Inc., to jointly develop an EMS guidance manual and template for adoption by individual producers. Murphy-Brown LLC is the nation?s largest swine producer and the first livestock operation in the world to have an EMS certified to ISO 14001. In addition, Smithfield Foods? Tarheel, N.C. packing plant, the world?s largest, has committed to encourage and assist swine farms doing business with the plant to implement an EMS. More information on the model EMS can be found at http://www.p2pays.org/iso/agriculture/pork/smithfield.asp.

Given the number and variety of potential benefits as a result of an EMS, the U.S. Dept. of Agriculture is encouraged to consider language for the Farm Bill to support voluntary adoption of EMS by a wide range of farms of any size. Encouragement of EMS in the Farm Bill should be considered:
? in language requiring conservation plans and other required plans,
? in allowance for submission of an EMS in lieu of conservation plans and similar required planning where feasible and practicable,
? in development of an agricultural EMS resources list or database maintained by the U.S. Dept. of Agriculture of model EMS, case studies, and other resource tools appropriate to foster EMS adoption by farmers,
? in providing incentive payments or grants to farms, with an emphasis on adoption by small farms, to implement an EMS and specific related objectives and targets to improve the environment, and
? in provision of funding to technical assistance providers and to state and local support teams who make recommendations or assist with building EMS capacity and knowledge through on-site assistance, training programs, and materials development and distribution.

Question5:
Question6: